

May 19, 2019

Regional Forester
USDA Forest Service

Attn: Base to Base Gondola Project Objection

1323 Club Drive

Vallejo, CA 94592

Objections-pacificsouthwest-regional-office@fs.fed.us Subject: Base to Base Gondola Project

Clerk of the Board of Supervisors
175 Fulweiler Avenue, Room 101
Auburn, CA 95603

Subject: Base to Base Gondola Project

Dear Regional Forester and Board of Supervisors,

I am sending an objection letter for the Base to Base Gondola Project. Here is the requested information pursuant to 36 CFR 218.8[d]:

- (1) Objector's name and address, with telephone number
 - *Judy Bruner*
 - *Permanent address: XXXXXXXX*
 - *Lake Tahoe address: XXXXXXXX*
- (2) Objector's signature or other verification of authorship
 - *Signature included on hard copy mailed to Regional Forester*
 - *Email address for Judy Bruner indicates authorship on electronic version*
- (3) Indication of a single lead objector: *Judy Bruner*
- (4) Project Name, Responsible Official's name and title, and name of affected National Forest(s) and/or Ranger District(s)
 - *Base to Base Gondola Project*
 - *Eli Ilano, Forest Supervisor – Tahoe National Forest*
- (5) Reasons for, and suggested remedies to resolve, the objection
 - *See body of letter*
- (6) Description of the connection between the objection and the objector's prior comments
 - *To facilitate this, I have attached the letter I submitted in response to the Draft EIS/EIR, and I have referenced my objections to those comments*

I have summarized my objections in 3 sections, numbered below:

1. Why is the Defined Purpose and Need of this project worth significant and unavoidable impacts?

The Final EIS/EIR and the Draft Record of Decision both state the following regarding the Purpose and Need of the project:

"The TNF needs to respond to SVSH's land use application, which proposes amendment of its SUP to improve connectivity between Alpine Meadows and Squaw Valley. The need, as expressed by SVSH, for improved connectivity between the ski areas is based on several factors. The developed snow sports trail network at Squaw Valley has limited terrain suitable for beginners and teaching; Alpine Meadows has

additional intermediate and beginner terrain. Squaw Valley has more resort amenities (e.g. accommodations, restaurants, shopping, entertainment); Alpine Meadows, in contrast, has limited amenities. Although guests can currently access both ski areas on the same lift ticket, they must drive or ride a shuttle bus between the two areas to access all the different terrain and amenities offered at both locations.”

In my previous comments on the Draft EIS/EIR (attached), I raised the question of why the objective of this project is worth accepting significant and unavoidable impacts on: the visual character of the area, construction, noise and Caltrans intersections & highways (see paragraph 5 of my attached letter dated 6/10/18).

The response to my previous comment, included in the Final EIS/EIR, says:

“If a project would result in significant and unavoidable impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency’s decision maker, in this case the Placer County Board of Supervisors, must prepare findings and issue a ‘statement of overriding considerations’ explaining in writing the specific economic, social or other considerations that they believe, based on substantial evidence, make those significant effects acceptable.”

We have not yet seen this required analysis from the Board of Supervisors, and The Draft Record of Decision (DROD) from the Forest Supervisor fails to make the case. The rationale in the DROD simply says:

“In particular, the Selected Alternative will improve connectivity between Squaw Valley and Alpine Meadows, thereby alleviating the existing difficulty associated with driving or shuttling between the two resorts. This improved connectivity will address the needs for additional beginner- and intermediate-level terrain at Squaw Valley and additional resort amenities (e.g., accommodations, restaurants, and guest infrastructure) at Alpine Meadows.”

I object to the DROD because it fails to provide any strong rationale as to why we must accept significant and unavoidable impacts simply to make it easier for a subset of skiers to travel between the resorts and more easily access beginner and intermediate level terrain and accommodations and restaurants.

The instructions for objection letters ask that the objector provide reasons for the objection and suggested remedies to resolve the objection.

- **Reason for Objection:**

- According to CEQA, the recommended alternative 4 continues to have significant and unavoidable impacts on the visual character of the area, noise (construction), and transportation (Caltrans intersections), even after mitigations. Under NEPA, the impact on transportation (Caltrans intersections) is adverse after mitigations. The public has not been provided with any “statement of overriding considerations” as to what makes these significant impacts acceptable.

- **Remedies to resolve the objection:**

1. Full Remedy: select alternative 1 (no action)

2. Partial Remedy: eliminate the two mid-stations

- The mid-stations have a much bigger footprint than the towers, creating significantly more impact on visual resources.
- In fact, the EIR/EIS says on pg. 27 of the 815 page PDF, that “...the mid-station under Alternative 4 would be on a peak and would therefore be more visible to the surrounding area than the Alternative 3 mid-station location.”
- Even if one accepts the purpose and need to allow easier access from Squaw to more beginner and intermediate level terrain and to allow easier access from Alpine Meadows to the accommodations and restaurants in Squaw, there is no need for the mid-stations to achieve this purpose and need. The alternative of eliminating the mid-stations, which would reduce the adverse impact on the visual character of the area and the adverse impacts to the GCW area, was arbitrarily not considered
- Further the design of the gondola with two mid-stations in-between the Squaw and Alpine resorts strongly suggests a project purpose that has not been adequately disclosed as such in the EIS/EIR. If one of the purposes of this project is to provide access to Troy Caldwell’s potential future resort (White Wolf), or create additional ski runs, then the EIS/EIR should be re-done to disclose and evaluate this purpose. The EIS/EIR does disclose that if the Caldwell development (which is likely) was to proceed the patrons would be allowed to exit the Gondola roughly a football field away from the GCW area. The impacts from such a likely foreseeable outcome are not disclosed.
- In fact the EIS/EIR is inconsistent as to what loading and unloading will be allowed at the Alpine Meadows mid-station. The EIS/EIR says on pg 88 of the PDF that with respect to the Alternative 4 Alpine Meadows mid-station:
 - “Access to this site would require construction of a segment of new permanent road on the Caldwell property. Like for Alternative 3, passengers would not be allowed to embark or disembark at this mid-station. However, this mid-station site is also close to the site of the proposed Caldwell property development. If the Caldwell property development is implemented, property owners and their guests would be permitted to enter and exit at this Alpine Meadows mid-station.”
- The EIS/EIR, which is inconsistent within the same paragraph about whether embarking and disembarking will be allowed, strongly suggests a purpose of this project that has not been explored within the evaluation. Further the project definition and boundaries are not consistently defined and the associated impacts disclosed.
 - This could be an aspect of the project to further explore in litigation.

2. Why are the recreational needs of a subset of skiers prioritized as more important than the recreational needs of users of the Granite Chief Wilderness (GCW) and the Five Lakes Trail?

Regarding impact on users of the GCW and the Five Lakes Trail, the Final EIS/EIR says about the selected Alternative 4:

Pg 99 of the Final EIS/EIR PDF:

“Visibility of additional infrastructure associated with implementation of Alternative 4 could result in adverse effects on opportunities for solitude or primitive and unconfined recreation for users of the National Forest System-GCW.”

Pg 142 of the Final EIS/EIR PDF:

“Under Alternative 4, users of the Five Lakes Trail would still encounter gondola infrastructure in sections of the trail where none is currently visible. Based on the five visual simulations created to analyze the visual impacts that would occur along the Five Lakes Trail as a result of each alternative, users of the Five Lakes Trail would be able to see infrastructure from three views where no infrastructure is currently visible (Views 10, 11, and 13).”

Pg 194 of the Final EIS/EIR PDF:

“Alternative 4 would degrade the project area’s existing visual character because it would result in visible infrastructure being built within 15 of the 21 views for which visual simulations were created. Specifically, Alternative 4 would have a substantial adverse effect on some of the scenic vistas identified as ridgelines and sparsely vegetated hillsides, and the existing visual character of the site would be degraded within some of these views from the perspective of some observers.”

Pg 222 of the Final EIS/EIR PDF:

“Alternative 4 on its own has the potential to result in a reduction to opportunities for solitude or primitive and unconfined recreation, which is characterized as an adverse effect. When added to this adverse effect, the effects associated with the Caldwell property development discussed above (the potential for an increased likelihood of visitor encounters and visual impacts for users of the National Forest System-GCW) would result in a cumulative adverse effect to opportunities for solitude or primitive and unconfined recreation within the National Forest System-GCW.”

In my comments to the Draft EIS/EIR (attached), I cited some of these same conclusions from the Draft EIS/EIR, and I raised the question of why we should accept a cumulative adverse effect on the recreation of those who enjoy wilderness areas and the Five Lakes Trail in favor of a slight convenience for a subset of skiers. Accepting these adverse and cumulative impacts to the GCW area are not consistent with the GCW Plan nor forest service rules and regulations that require minimizing the effects of existing impacts and preventing or minimizing many possible future impacts. This Forest Service decision would open the door to these adverse impacts while less invasive alternatives exist and were not considered.

The response to my previous comment, included in the Final EIS/EIR, says:

“The question of whether or not the project’s adverse effects (NEPA) or significant impacts (CEQA) are worth accepting in light of the project’s benefits resides with the respective decisionmakers (i.e., Forest Service Supervisor and Placer County Board of Supervisors) and is not within the purview of the EIS/EIR document.

Please refer to the Draft Record of Decision and the decision provided by the Placer County Board of Supervisors for this project, which provide detailed rationale from the decisionmakers on how the project would or would not meet

the project's identified Forest Service purpose and need and CEQA project objectives.”

The response is arbitrary and woefully inadequate. Even if one accepts the notion that it is '*not within the purview of the FS*' to fully consider the adverse impacts to a Congressionally designated wilderness area, the duty to fully disclose these impacts remains under NEPA. Further, nothing in the governing Forest Service Management Plan, GCW plan or Scott Management plan sets forth a mandate to rule in favor of one set of values--a subset of skiers--vs another set of values -- protecting in perpetuity the opportunities for wilderness, which are becoming increasingly scarce. The Draft Record of Decision does not address why the recreation of a subset of skiers should be prioritized over the recreation of those that enjoy the wilderness areas and the Five Lakes Trail. Therefore, I object to the DROD.

Reason for Objection:

- The DROD fails to provide a rationale for why the recreation of a subset of skiers should be prioritized over the recreation of those that enjoy the wilderness areas and the Five Lakes Trail. Rather, the DROD focuses on why Alternative 4 is the best approach between alternatives 2, 3 and 4 to meet the Purpose and Need of the project while minimizing resource impacts to the identified key issues (visual resources, wilderness and SNYLF).
- The Final EIS/EIR does not fully evaluate all practical alternatives. NEPA requires an agency to examine all reasonable alternatives. In addition, NEPA and CEQA require that the scope of alternatives in an EIS/EIR must reflect technical, economic and common-sense practicable alternatives. The common-sense practicable alternatives excluded from the EIS/EIR include but are not limited to:
 - A land-based transportation alternative was proposed by me and many others, and yet SVSH and the Forest Service arbitrarily eliminated this practical alternative because SVSH felt skiers would not find it as convenient or enjoyable, even though it very clearly meets the SVSH purpose and need. The final EIS/EIR fails to evaluate any adjustments or improvements to the current land-based transportation that could meet the project's stated objective with significantly less environmental impact, in particular to visual character, noise and wildlife.
 - NEPA requires that no-build or no-action alternatives be considered and discussed in a comparable level of detail to the other alternatives. That was not done in this case.

Remedies for Objection:

1. Remedy 1: Select Alternative 1 (no action) and develop a low-emissions, frequent shuttle to meet the defined Purpose and Need.
 - a) I note that the Final EIS/EIR eliminated this alternative, saying that existing shuttle use has been low and that “This particularly low shuttle usage is an indicator that guests do not presently find it convenient and/or effective to shuttle between the two resorts.”
 - b) It may be true that guests don't particularly enjoy using a shuttle and would rather use a gondola, but this is a slight inconvenience for a subset of skiers who want to go back and forth between the resorts in one day or back and forth without having a car at the resort. The Purpose and Need defined in the

Final EIS/EIR and the DROD is viewed by many as hardly a “Need”, and there is no rationale provided for why it is more important than the enjoyment of the hikers who use the Five Lakes Trail and GCW and others who currently enjoy the visual scenery of the area.

2. Remedy 2: Revise the EIS/EIR to fully evaluate common-sense practicable alternatives, including a land-based alternative.
3. **Impacts on the GCW have not been adequately disclosed or analyzed, and the cumulative impact of the Gondola combined with the likely White Wolf project has not been adequately disclosed or analyzed**

I raised objections to the analysis of the cumulative impact in my comments to the Draft EIS/EIR (see attached letter, section 5.).

Reasons for Objection:

1. The Final EIS/EIR fails to adequately disclose the impact of construction on the GCW and the federally designated GCW area.
 - a) The proposed construction road would cross federally designated GCW land which is currently privately owned. The existing private road, constructed without a permit, will undoubtedly need substantial grading, blasting and widening for use in the construction of the Gondola project. Description of the precise routes and impacts have not been disclosed. Allowing construction road(s) to be built in a Congressionally designated wilderness area will likely permanently deface and damage the wilderness characteristics. The full impacts have not been disclosed and thus it is impossible to determine how and if mitigation will be successful to restore these areas and the visual majesty of these lands. The extent of construction roads for Alternative 4 have not been fully disclosed. The actual routes and impacts are left to a later date.
 - b) There is also inadequate disclosure of the impact of construction and blasting on the GCW and the federally designated GCW area.
2. The final EIS/EIR also fails to disclose and address the impact on the GCW, in particular the Five Lakes area, of allowing gondola users to disembark at the Alpine Meadows mid-station for intended use of the White Wolf project, and how the limits on disembarking would be enforced.
 - a) The final EIS/EIR fails to address how the people who embark or disembark will be limited to White Wolf residents.
3. The final EIS/EIR also fails to provide firm assurance that the gondola will never be used for summer transportation.
 - a) Any summer usage would significantly increase the impact on the GCW.
4. While the final EIS/EIR clearly contemplates the White Wolf project, it fails to adequately explore the cumulative impact of the likely White Wolf project in conjunction with the Gondola.

Remedies for Objection:

- Revise the EIS/EIR to provide adequate disclosure and analysis and allow public comment regarding:
 - The impact of the construction road(s) on the congressionally designated GCW area.

- The impact and enforcement of disembarking at the Alpine Meadows mid-station.
- The process under which the Gondola could obtain approval for summer usage. Would an EIS/EIR be required?
- The cumulative impact of the Gondola along with the likely White Wolf project, for which the Gondola seems to have been partially designed.

Sincerely,

Judy Bruner